

CAMPBELL & WILLIAMS  
Philip R. Erwin (11563)  
710 South Seventh Street  
Las Vegas, Nevada 89101  
Tel.: (702) 382-5222  
Fax: (702) 382-0540  
pre@cwlawlv.com

WINSTON & STRAWN LLP  
Sean G. Wieber (*pro hac vice*)  
Kevin P. Simpson (*pro hac vice*)  
James W. Randall (*pro hac vice*)  
35 W. Wacker Dr.  
Chicago, Illinois 60601  
Tel.: (312) 558-5600  
Fax: (312) 558-5700  
swieber@winston.com  
kpsimpson@winston.com  
jwrandall@winston.com

*Counsel for Defendant Absolute Dental Group, LLC*

[Plaintiffs' counsel listed below]

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

KATHLEEN JORDAN et al., individually  
and on behalf of all others similarly situated,

Plaintiffs,

v.

ABSOLUTE DENTAL GROUP, LLC,

Defendant.

Case No. 2:25-cv-00986-JAD-DJA

**STIPULATION AND ~~PROPOSED~~  
ORDER EXTENDING TIME FOR  
DEFENDANT ABSOLUTE DENTAL,  
LLC TO RESPOND TO THE FIRST  
AMENDED COMPLAINT**

**(SECOND REQUEST)**

IT IS HEREBY STIPULATED AND AGREED between Plaintiffs Kathleen Jordan, Marlo Eastman, Edwina Jackson, Amanda Maduiké-Iwata, and Viridiana Tinajero Monterroza (collectively, "Plaintiffs") and Defendant Absolute Dental Group, LLC ("Absolute Dental," and together with Plaintiffs, the "Parties"), by and through their undersigned counsel, that Absolute Dental shall have an additional 14 days, to and including September 23, 2025, to answer or otherwise respond to the First Amended Complaint (ECF No. 9). In support of their stipulation, the Parties state as follows:

1           1.       On June 4, 2025, Plaintiff Jordan filed the initial Complaint in this action, raising claims  
2 arising out of an alleged data security incident that potentially impacted certain information pertaining to  
3 Absolute Dental's patients (the "Data Security Incident"). *See* ECF No. 1. Plaintiff Jordan served  
4 Absolute Dental with the initial Complaint on June 9, 2025. *See* ECF No. 5.

5           2.       Plaintiffs Eastman, Jackson, Maduik-Iwata, and Tinajero Monterroza each subsequently  
6 filed separate putative class actions against Absolute Dental in Nevada state court, also raising claims in  
7 connection with the Data Security Incident.

8           3.       Thereafter, Absolute Dental's counsel engaged in discussions with Plaintiffs' counsel  
9 about combining all pending actions into a single action.

10          4.       On June 25, 2025, Plaintiff Jordan filed the First Amended Complaint ("FAC"), adding  
11 Plaintiffs Eastman, Jackson, Maduik-Iwata, and Tinajero Monterroza as plaintiffs in this action. *See*  
12 ECF No. 9. On June 27, 2025, Plaintiff Jordan served Absolute Dental with the FAC. Subsequently,  
13 Plaintiffs Eastman, Jackson, Maduik-Iwata, and Tinajero Monterroza voluntarily dismissed their  
14 separate state court actions.

15          5.       On July 8, 2025, the Parties filed a stipulation requesting that the Court extend Absolute  
16 Dental's deadline to answer or otherwise respond to the FAC to September 9, 2025. ECF No. 25. The  
17 grounds for the extension were, among other reasons, that Absolute Dental "require[d] additional time to  
18 further investigate the Data Security Incident, confirm the identities of individuals whose personal  
19 information was potentially impacted, confirm the associated types of personal information that were  
20 potentially impacted, and then provide notice of the Data Security Incident to those individuals as  
21 required by federal and state laws." *Id.*

22          6.       On July 9, 2025, the Court granted the Parties' request to extend Absolute Dental's  
23 deadline to answer or otherwise respond to the FAC to September 9, 2025. ECF No. 27.

24          7.       On August 26, 2025, Absolute Dental began providing notice of the Data Security Incident  
25 to potentially impacted individuals as required by certain federal and state laws.

26          8.       On September 2, 2025, Plaintiffs filed an unopposed motion for leave to file a Second  
27 Amended Complaint ("SAC"). *See* ECF No. 40. The Court has not yet ruled on Plaintiffs' motion.

9. As noted above, Absolute Dental's current deadline to answer or otherwise respond to the FAC is September 9, 2025.

10. The Court may extend Absolute Dental's response deadline "for good cause . . . if [the] request is made before the original time . . . expires[.]" Fed R. Civ. P. 6(b)(1)(A).

11. Good cause exists for the requested 14-day extension. The Parties wish to avoid expending the time and expense of responding to and litigating the FAC when it may soon be superseded by the SAC. Thus, the Parties respectfully request that the Court extend Absolute Dental's response deadline to allow time for the Court to rule on Plaintiff's motion for leave to amend the FAC.

12. This is the second extension requested by any Party in this matter. This request is not made to delay proceedings or for any other improper purpose, and neither the Parties nor the Court will be prejudiced by the requested extension.

13. Accordingly, the Parties stipulate to and respectfully request that the Court extend Absolute Dental's deadline to respond to the FAC by 14 days, to and including September 23, 2025.

IT IS SO STIPULATED.

DATED this 8th day of September

/s/ Philip R. Erwin  
**CAMPBELL & WILLIAMS**  
PHILIP R. ERWIN (11563)  
710 South Seventh Street  
Las Vegas, Nevada 89101  
Tel.: (702) 382-5222  
Fax: (702) 382-0540  
pre@cwlawlv.com

*Counsel for Defendant Absolute Dental Group, LLC*  
(Additional Defendant's counsel on next page)

DATED this 8th day of September

/s/ Andrew Ferich  
**AHDOOT & WOLFSON, PC**  
Andrew W. Ferich (*pro hac vice*)  
201 King of Prussia Road, Suite 650  
Radnor, PA 19087  
Tel.: (310) 474-9111  
Fax: (310) 474-8585  
aferich@ahdootwolfson.com

*Counsel for Plaintiffs*  
(Additional Plaintiffs' counsel on next pages)

IT IS SO ORDERED.

  
\_\_\_\_\_  
DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE

DATED: 9/11/2025

**WINSTON & STRAWN**

SEAN G. WIEBER (*pro hac vice*)  
KEVIN P. SIMPSON (*pro hac vice*)  
JAMES W. RANDALL (*pro hac vice*)  
35 W. Wacker Dr.  
Chicago, Illinois 60601  
Tel.: (312) 558-5600  
Fax: (312) 558-5700  
swieber@winston.com  
kpsimpson@winston.com  
jwrandall@winston.com

*Counsel for Defendant Absolute Dental  
Group, LLC*

**MILBERG COLEMAN BRYSON PHILLIPS  
GROSSMAN, PLLC**

MARIYA WEEKES (*pro hac vice*)  
201 Sevilla Ave., 2nd Floor  
Coral Gables, Florida 33134  
Tel: (786) 879-8200  
Fax: (786) 879-7520  
mweekes@milberg.com

**STRANCH, JENNINGS & GARVEY, PLLC**

NATHAN R. RING (12078)  
3100 W. Charleston Blvd., Suite 208  
Las Vegas, Nevada 89102  
Tel.: (725) 235-9750  
nring@stranchlaw.com  
gstranch@stranchlaw.com

**STRANCH, JENNINGS & GARVEY, PLLC**

ANDREW E. MIZE (*pro hac vice*)  
The Freedom Center  
223 Rosa L. Parks Avenue, Suite 200  
Nashville, TN 37203  
Tel.: (615) 254-8801  
amize@stranchlaw.com

**FEDERMAN & SHERWOOD**

WILLIAM B. FEDERMAN (*pro hac vice*)  
KENNEDY M. BRIAN (*pro hac vice*)  
10205 North Pennsylvania Ave.  
Oklahoma City, Oklahoma 73120  
Tel.: (405) 235-1560  
wbf@federmanlaw.com  
kpb@federmanlaw.com

**CAFFERTY CLOBES MERIWETHER &  
SPRENGEL LLP**

NICKOLAS J. HAGMAN  
(*pro hac vice* forthcoming)  
135 S. LaSalle, Suite 3210  
Chicago, Illinois 60603  
Tel.: (312) 782-4880  
Fax: (312) 782-4485  
nhagman@caffertyclobes.com

*Counsel for Plaintiffs*  
(Additional Plaintiffs' counsel on next page)

**FREEDOM LAW FIRM**  
GEORGE HAINES (9411)  
GERARDO AVALOS (15171)  
8985 S. Eastern Ave., Suite 100  
Las Vegas, NV 89123  
Tel.: 702-880-5554  
Fax: 702-385-5518  
info@freedomlegalteam.com

**LEVERTY AND ASSOCIATES LAW,  
CHTD.**

PATRICK R. LEVERTY (8840)  
832 Willow Street  
Reno, Nevada 89503  
Tel.: (775) 322-6636  
pat@levertylaw.com

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing **STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR DEFENDANT ABSOLUTE DENTAL, LLC TO RESPOND TO THE FIRST AMENDED COMPLAINT** was served on September 8, 2025, via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ Philip R. Erwin  
PHILIP R. ERWIN